

EXHIBIT O

WILLIAM MATTHEW JONES
UNITED STATES vs STATE OF GEORGIA

January 10, 2023

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STATE OF GEORGIA,

Defendants.

- - - - -

) CIVIL ACTION
) NO. 1:16-cv-03088-ELR
)
)
)
)
)
)
)

VIDEOTAPE DEPOSITION OF
WILLIAM MATTHEW JONES

Tuesday, January 10, 2023, 9:06 a.m., EST

HELD AT:

Robbins Firm
500 14th Street, N.W.
Atlanta, Georgia 30318

WANDA L. ROBINSON, CRR, CCR, No. B-1973
Certified Shorthand Reporter/Notary Public

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1 Q What courses?

2 A All teachers were required to take like an
3 introductory course to supporting exceptional
4 learners.

5 Q Did you take any other special education
6 courses?

7 A There were content woven in other like
8 introduct -- or education courses but no specific
9 course outside of that course.

10 Q Do you hold any professional
11 certifications?

12 A I do.

13 Q What are they?

14 A Teaching certificate.

15 Q When did you receive that?

16 A Should be around the same year I
17 graduated, so 2007.

18 Q And it is still active?

19 A It is still active.

20 Q Do you have any certifications in special
21 education?

22 A No.

23 Q What is your current job title?

24 A Chief of staff.

25 Q And who is your employer?

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1 A The Georgia Department of Education.

2 Q When did you officially assume this
3 position?

4 A It would have been around 2015.
5 Technically '14. I came in a few months before the
6 superintendent was sworn in.

7 So that November or December of 2014.

8 Q Before the superintendent was sworn in in
9 January?

10 A That's correct.

11 Q And when we're referring to the
12 superintendent, are we referring to Superintendent
13 Richard Woods?

14 A That's correct.

15 Q Do you report to Superintendent Woods?

16 A I do.

17 Q Do you report to anyone else?

18 A No. Just Superintendent Woods.

19 Q Does Superintendent Woods evaluate you?

20 A I would say so.

21 Q In a --

22 A Not a formal way, but definitely provides
23 feedback.

24 Q So you do not have formal job evaluations?

25 A We do have job evaluations in the agency,

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1 Q And what is the basis for your belief?

2 A That it should be provided in GNETS
3 programs.

4 Q Your basis is it should be, so you think
5 that it's happening?

6 A Yes.

7 Q Have you followed up to ask anyone?

8 A I have not heard anything from our staff
9 members to say anything different from that
10 expectation.

11 Q Have you expressed that expectation to any
12 of your staff members?

13 A I would say that's probably a shared
14 expectation with myself and the staff, staff
15 members.

16 Q And that's an assumption?

17 A Yes.

18 Q Okay. I'll show you another exhibit.

19 MS. TUCKER: What time is it?

20 (Discussion ensued off the record.)

21 MS. TUCKER: Let's do just a few more
22 pages and then we'll stop.

23 Q Is that okay?

24 A Yes, that's fine.

25 MS. GARDNER: I'd like the court reporter

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1 to mark the following document as Plaintiff's
2 Exhibit 827.

3 (WHEREUPON, Plaintiff's Exhibit-827 was
4 marked for identification.)

5 BY MS. TUCKER:

6 Q Mr. Jones, this is an email thread
7 including you, Vickie Cleveland, Ted Beck, and
8 Rachel Spates, that was produced by the State.

9 The subject reads: "Listening session
10 tomorrow."

11 The most recent email in the thread is
12 dated April 30, 2019.

13 The Bates number on the bottom of the
14 first page reads GA03522299.

15 Mr. Jones, do recognize this email thread?

16 A Yes.

17 Q Who is Ted Beck?

18 A He was the chief financial officer at the
19 time.

20 Q And does he still hold that role?

21 A He does not.

22 Q Let's look to the bottom email, which is
23 on the third page, the bottom email in the thread.

24 A Okay. Yes.

25 Q Okay. Who is Rachel Spates? She's

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1 A No.

2 Q How about the Governor's Office?

3 A No, I did not.

4 Q Look at the top email, Vickie Cleveland's
5 response to you on April 30, 2019.

6 Do you see where she wrote, quote: "GaDOE
7 does provide the following core supports through
8 contracts"? And then she lists some instructional
9 supports and therapeutic supports.

10 Do you see that?

11 A I do.

12 Q Are these the current instructional
13 supports provided by GaDOE that benefit the GNETS
14 program?

15 A I'm not sure the current list but I'm sure
16 some still are in place.

17 Q Do you know if GaDOE provides
18 instructional supports to the GNETS programs?

19 A I believe so.

20 Q And what about therapeutic supports?

21 A I believe so.

22 MS. TUCKER: I think this would be a good
23 time to break for lunch.

24 Q Does that work for you?

25 A Yes, it does.

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1 Q Did you ask any questions?

2 A I likely did but I can't recall specific
3 questions.

4 MS. TUCKER: I'd like the court reporter
5 to mark the following document as Plaintiff's
6 Exhibit 829.

7 (WHEREUPON, Plaintiff's Exhibit-829 was
8 marked for identification.)

9 BY MS. TUCKER:

10 Q This is a July 19th, 2016 email produced
11 by the State.

12 It's from Nakeba Rahming to you, with the
13 subject "Message Script and PPT."

14 There are two attachments, and the Bates
15 number on the first page of this document is
16 GA03468710.

17 Do you recognize this email?

18 A I do.

19 Q And PPT in the subject refers to
20 PowerPoint?

21 A Yes.

22 Q Let's turn to the first attachment, which
23 has the Bates No. GA03468711.

24 And this is the PowerPoint.

25 Do you see it?

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1 A Yes.

2 Q The PowerPoint, do you recognize it?

3 A I do.

4 Q And the first -- the title page reads
5 "GNETS Facilities Online Meeting"?

6 A Yes.

7 Q Who created this PowerPoint?

8 A I believe Nakeba pulled this PowerPoint
9 together.

10 Q Did you ask her to?

11 A I think it was part of the plan once the
12 decision was made around facilities to pull together
13 a meeting like this, and I think she created the
14 PowerPoint from there.

15 Q Did you review it in advance of the
16 meeting?

17 A I did, but I remember it being extremely
18 tight turnaround.

19 Q Looking at the Slide 2 with the title
20 "GNETS Facilities Online Meeting," your name is
21 right under the title.

22 Did you lead the meeting?

23 A I believe I opened the meeting.

24 Q Did you join the meeting in its entirety?

25 A Yes.

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1 Q Looking at Slide 7, when you're there.

2 A Yes.

3 Q Okay. It reads, quote: "Nine out of the
4 multiple sites will need to relocate students
5 immediately." And then in parentheses "before the
6 beginning of school." End parentheses, end quote.

7 Do you see that?

8 A I do.

9 Q Who made this decision?

10 A The State Board.

11 Q Were you part of conversations with the
12 State Board about this decision?

13 A Very limited conversations.

14 Q What do you mean by that?

15 A It was essentially a directive. They had
16 decided it.

17 Q Were you there when they made the
18 decision?

19 A I was there when it was communicated, not
20 necessarily the back and -- the discussions that
21 they had on their end.

22 Q Did you ask follow-up questions?

23 A We expressed that it would be more ideal
24 to close out the school year just to limit
25 disruptions to students.

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1 Q So this was before the 2016-17 school
2 year. So just to make sure I understand, were you
3 saying to continue having these facilities open
4 during the 2016-17 school year and then closing out
5 the next year?

6 A Yes. I think it was in the -- let me see
7 the date.

8 Yes, it was just to be the start at the
9 school year.

10 Q Right.

11 A So I think we were trying not to disrupt
12 the start of the school year. So I think it wasn't
13 -- my apologies.

14 Not to finish out the school year but at
15 least get through the first semester to minimize the
16 impact on students because a lot of schools were
17 just about to start within the next few weeks.

18 Q And what did the State Board say back to
19 your proposal?

20 A They wanted to move forward with the
21 current plan to shut -- relocate the students
22 immediately.

23 Q Did they provide any additional context on
24 the immediacy?

25 A No.

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1 sites, as long as the same services are being
2 delivered elsewhere, I would see it as similar.

3 Q Let's look at this attachment.

4 The Bates number on the bottom is
5 GA03479097.

6 The top of the document has the GaDOE logo
7 and it's titled, "Local Education Agency Systemic
8 Reintegration Planning."

9 Do you recognize the attachment?

10 A Yes.

11 Q Did you provide input on this attachment?

12 A It was shared with me, of course, but, no,
13 I did not provide feedback on this attachment.

14 Q Looking at Pages 2 and 3, it seems there
15 was a need for a systemic reintegration plan that
16 would be submitted to GaDOE?

17 A Yes.

18 Q This was submitted to the GaDOE's -- or it
19 says to the state GNETS director. Would that be the
20 GNETS program manager?

21 A That's correct.

22 Q So this was Nakeba Rahming or Vickie
23 Cleveland?

24 A Yes. Nakeba at the time.

25 Q And then again at the top of Page 1 it

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1 facility that was in that system.

2 Q Do you know if that's still the plan?

3 A I haven't heard anything different, so I
4 would assume that's still the plan.

5 Q What is the GNETS grant application?

6 A Could you specify that a little bit more?

7 Q Yeah. We spoke about it a little bit.

8 What does the GNETS grant application
9 provide to the regional GNETS programs?

10 A The application is what they fill out to
11 receive the grant funds, and then they submit a
12 budget that's reviewed and approved by staff on how
13 to use -- expend those funds.

14 Q Is it -- do each regional program complete
15 it annually?

16 A I believe so.

17 Q Have you reviewed GNETS grant
18 applications?

19 A I have not.

20 Q How about when you were directly working
21 with Nakeba Rahming?

22 A I did not.

23 Q Do you know anyone else who assesses the
24 GNETS grant applications?

25 A Not outside the team. I mentioned it